

1 GRETCHEN C. von HELMS, ESQ.
California State Bar No. 156518
2 105 West "F" Street, Suite 306
San Diego, CA 92101-6036
3 Telephone: (619) 239-1199
Fax: (619) 236-8820
4 gvh@ronisandronis.com

5 Attorney at for Defendant
6 Jonathan Peña

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9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**
11 (HONORABLE MARILYN L. HUFF)

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 JONATHAN PEÑA,

16 Defendant.
17 _____

Case No. 16-cr-01409-H-5

JOINT MOTION TO
MODIFY CONDITIONS OF
PRE-TRIAL RELEASE

18 **IT IS HEREBY REQUESTED** and agreed by and between defendant Jonathan
19 Peña, by and through his attorney Gretchen C. von Helms, and the UNITED STATES OF
20 AMERICA, by and through its counsel, Valerie Chu, United States Attorney, that the
21 defendant's conditions of pre-trial release be modified such that he be allowed to travel
22 with his fiancée to Cancun, Mexico from Los Angeles, CA from March 24-31, 2017, to
23 make arrangements for their upcoming wedding. Mr. Peña was scheduled to go last year,
24 but was arrested and unable to make the trip. It has since been rescheduled by his fiancée
25 and he would like to attend in order to assist her in scouting venues and vendors for their
26 wedding. The United States Pre-trial service officer from the Central District of
27 California, Verence Gardea, phone number (213)894-4354, who has been supervising
28 Mr. Peña, has no objection to this request. He will check in with Ms. Gardea before his

1 departure, upon his arrival in Mexico and upon his return to the United States.

2 Mr. Peña's passport was surrendered to Pre-trial Services in the Southern District
3 of California at the commencement of this case, so in order to travel internationally, Mr.
4 Peña will need to have his passport returned for purposes of travel, but will surrender it
5 again upon return to the United States.

6 Mr. Peña has been compliant with all conditions of his pre-trial release. All other
7 bond conditions are to remain as set.

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9 The parties hereby stipulate and agree to the foregoing:
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12 Dated: February 16, 2017

s/s Gretchen von Helms
GRETCHEN C. VON HELMS
Attorney for Defendant Mr. Peña

14
15 Dated: February 16, 2017

s/s Valerie Chu
VALERIE CHU
Assistant United States Attorney